

November 19, 2024

VIA ECF

Hon. Valerie E. Caproni
 United States District Court
 Southern District of New York
 40 Foley Square, Room 240
 New York, NY 10007

**Re: *Relevent Sports, LLC v. United States Soccer Federation, Inc.,*
 No. 19-cv-8359 (VEC)**

Dear Judge Caproni:

Further to the parties' joint status letter filed on November 15, 2024, the parties submit this supplemental status update regarding certain agreements reached with respect to document discovery in this action.

ESI Protocol. The parties are near agreement on an ESI protocol.

RFP Negotiations. The parties agreed to complete negotiations over Relevent's existing Requests for Production to USSF ("Relevent RFPs") and USSF's existing Requests for Production to Relevent ("USSF RFPs") by the end of this calendar year. These negotiations will include issues pertaining to custodians, search terms, and scope of the requests. The parties are scheduled to meet-and-confer on Tuesday, November 19.

Temporal Scope. The parties previously agreed to a relevant time period for each of the requests in the Relevent RFPs. Subsequently, the USSF RFPs sought relevant time periods that were more expansive than what was agreed to for the Relevent RFPs. Accordingly, to the extent that Relevent agrees to produce documents from a date range that is larger than the date range USSF has agreed to for the Relevent RFPs, USSF will consider reciprocally expanding the previously agreed upon timeframe for the Relevent RFPs. To avoid multiple collections, the parties will prioritize negotiations regarding the temporal scope of the USSF RFPs.

Productions. The parties will each begin making rolling productions of documents to the Relevent RFPs and USSF RFPs, respectively, on or before February 15, 2025. The parties will substantially complete those document productions by April 11, 2025.

[signature page follows]

Respectfully submitted,

s/ Jeffrey L. Kessler
Jeffrey L. Kessler
Jonathan J. Amoona
Angela A. Smedley
Adam I. Dale
WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
Tel: (212) 294-6700
Fax: (212) 294-4700
jkessler@winston.com
jamoona@winston.com
asmedley@winston.com
aidale@winston.com

Counsel for Relevent Sports, LLC

s/ Lawrence E. Buterman
Lawrence E. Buterman
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Tel: (212) 906-1200
Fax: (212) 751-4864
lawrence.buterman@lw.com

Christopher S. Yates (*pro hac vice*)
LATHAM & WATKINS LLP
505 Montgomery Street
Suite 2000
San Francisco, CA 94111
Tel: (415) 391-0600
Fax: (415) 395-8095
chris.yates@lw.com

Counsel for Defendant United States Soccer Federation